BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMING THE OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

COMPELLED RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF NEWSPAPER ASSOCIATION OF AMERICA (NAA/USPS—1(A), (D))

Pursuant to P.O. Ruling No. R2000-1/53, the United States Postal Service hereby provides its response to the following interrogatory of the Newspaper Association of America: NAA/USPS—1(a) and (d), filed on March 23, 2000. The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Attorney

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RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF NEWSPAPER ASSOCIATION OF AMERICA

NAA/USPS-1. Please refer to the United States Postal Service 1998 Marketing Plans, filed in Docket No. R97-1 as library reference NAA LR-NAA/R97-1 LR 2.

- a. Does Postal Service management currently use this document?
- d. Has the Postal Service produced a more recent marketing plan, comparable to this one, since October 1997?

RESPONSE:

- a) No.
- d) Yes.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Anthony Alverno

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